

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

v

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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**PLAINTIFF'S SUPPLEMENTAL AUTHORITY IN SUPPORT OF ITS RENEWED
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff American University of Antigua College of Medicine ("AUA"), through Counsel, supplements its Renewed Motion for Preliminary Injunction (Docket No. 45) as follows:

1. On November 8, 2010, AUA served on Defendant Requests for Admissions pursuant to Fed. R. Civ. P. 36. Exhibit A, Requests and Proof of Service (Docket No. 50).
2. These requests clearly stated "[p]ursuant to Fed. R. Civ. P. 36(a)(3) you have 30 days from the date of this request to respond."

3. Defendant did not respond within 30 days and to date has not filed any responses¹.

4. These requests were conclusively admitted by Defendant's failure to answer. Fed. R. Civ. P. 36(a)(3).

5. The admitted facts therefore include that Defendant:

- a. Made a number of defamatory statements. (Requests 14 through 25 and 28 through 36).
- b. Those statements were false (Request 37).
- c. They were published to third parties. (Requests 9 and 10).
- d. They were intended to injure Plaintiff. (Request 14).

6. Defendant having conceded all the elements of Plaintiff's defamation claim, success on the merits at trial is certain.

For all the reasons stated in AUA's renewed motion (Docket No. 45), reply in support (Docket No. 49) and the instant supplemental authority, AUA respectfully requests that this Court enter an Order:

- A. Granting AUA's Motion in its entirety;
- B. Enjoining Defendant Steven Woodward, as well as any agent, internet service provider, domain registry and/or website host acting at his direction or request:
 1. From all further publication under the internet domain name www.aua-med.com and www.aua-vet.com;
 2. From the unlicensed publication, in any manner, of AUA student academic records (other than his own); and

¹ Plaintiff notes that any dilatory filing of these responses would not be sufficient to withdraw the admission. Fed. R. Civ. P. 36(b).

3. From publication of all other contents presently disseminated through his website www.aua-med.com or www.aua-vet.com by any other means or medium; and
- C. Granting AUA any other relief that this Honorable Court deems appropriate.

Respectfully Submitted,

/s/ Eric A. Buikema (P58379)
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiff's Supplemental Authority in Support of its Renewed Motion for Preliminary Injunction and this Certificate of Service were served upon Steven L. Woodward, Defendant, via his email address Steve_L_woodward@yahoo.com and First Class U.S. mail to Steven Woodward, c/o 7211 Brittwood Lane, Flint, MI 48507 on December 14, 2010.

/s/ Eric A. Buikema
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